

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)
Debtors. : (Jointly Administered)
-----x Ref. Docket Nos. 4349, 9395

**DECLARATION OF HERB BAER REGARDING CORRECTED AFFIDAVIT OF
SERVICE FOR NOTICE OF DEADLINES FOR FILING PROOFS OF CLAIM**

Herb Baer makes this declaration pursuant to 28 U.S.C. § 1746, and states:

1. I am over the age of eighteen years and am not individually a party to the above-captioned proceedings.
2. I am a Director of Client Services of Epiq Bankruptcy Solutions, LLC (“Epiq”), located at 757 Third Avenue, 3rd Floor, New York, New York 10017. Unless otherwise stated, I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.
3. Lehman Brothers Holdings Inc. and its affiliated debtors (the “Debtors”) retained Epiq as their Claims and Noticing Agent pursuant to an Order of the Court dated September 16, 2008. Accordingly, Epiq maintains the official claims register reflecting all claims listed in the Debtor’s Schedules of Liabilities, as amended, and all filed proofs of claim (the “Claims Database”). Additionally, Epiq maintains a database of names and addresses of all potential creditors of the Debtors listed in their Creditor Matrix (together with the Claims Database, the “Master Mailing List”).
4. On July 8, 2009, I caused to be served the “NOTICE OF DEADLINES FOR FILING PROOFS OF CLAIM”, dated July 8, 2009 (the “Bar Date Notice”) and a Proof of Claim

Form upon on all names and addresses in the Master Mailing List as they existed at the time (the “Bar Date Mailing”).

5. My “Affidavit of Service” dated July 10, 2009 details all parties that were served, and the manner in which they were served [Docket # 4349] (the “Initial Service Affidavit”). The Initial Service Affidavit incorrectly listed the address of certain parties that were served.

6. To correct any errors on the Initial Service Affidavit, I submitted a “Corrected Affidavit of Service” [Docket # 9395] which fully superseded the Initial Service Affidavit.

7. I hereby certify that all parties were served at the addresses included on the Corrected Affidavit of Service, in the manner described therein.

8. Amongst other errors, the Initial Service Affidavit incorrectly indicated that all Bar Date Notices that were sent to parties located in Dusseldorf, Germany, were sent to addresses in Dusseldorf, Georgia. This systematic error occurred in the creation of the exhibits to the Initial Service Affidavit, but did not occur in the Bar Date Mailing. In fact, Bar Date Notices that were sent to parties located in Dusseldorf, Germany were sent to Dusseldorf, Germany, as indicated in the Corrected Affidavit of Service.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on this 8th day of June, 2012.

/s/ Herb Baer
Herb Baer